

Morris-Gibson v. UAW, et al.
Case No. 2:20-cv-11346

Brief in Support of Defendant George Hardy's Motion for Summary Judgment
Supporting Documents

EXHIBIT 1

**Patricia Morris-Gibson ("PMG")
Deposition Transcript Excerpts**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PATRICIA MORRIS-GIBSON, an)	
individual,)	
)	
Plaintiff,)	
-vs-)	Case No.
THE INTERNATIONAL UNION,)	2:20-cv-11346
UNITED AUTOMOBILE, AEROSPACE)	
AND AGRICULTURAL IMPLEMENT)	
WORKERS OF AMERICA (UAW),)	
GERALD KAREEM, MIGUEL FOSTER,)	
and GEORGE HARDY,)	
)	
Defendants.)	

Videotaped Deposition of PATRICIA MORRIS-GIBSON

Wednesday, July 7, 2021 - 9:58 a.m. EST

Reported by:

SUSAN K. TODAY, CSR-IL, RPR

Job No.: Mo2722

1 A. No.

2 Q. You don't know?

3 A. No, I don't know.

4 Q. So you came on staff at the UAW in

5 November of 2018 -- I'm sorry -- 2008?

6 A. Yes.

7 Q. And what does an International rep in
8 the TOP department service -- TOP do? Or at least
9 what did they do at that time?

10 A. At that time I serviced BlueCross
11 BlueShield. So I negotiated their contracts. I
12 was a part of their arbitrations. I was a part of
13 their grievance meetings, their presidents
14 meetings. Any type of meeting that they would
15 have, that the union leadership at BlueCross would
16 have, I was a part of that.

17 Q. And at that point the TOP department was
18 underneath Vice President Settles; is that right?

19 A. Yes.

20 Q. And who was your supervisor?

21 A. Dave Burtch.

22 Q. What position did Dave Burtch have, if
23 you recall?

24 A. He was an AA. He was Jimmy's top AA.

1 Vice President Settles, or you had no opinion?

2 A. I was ecstatic that it was under the
3 office of the president.

4 Q. Did you make a request at any point to
5 work in the Ford department under the office of
6 Vice President Settles?

7 A. In the Ford department?

8 Q. Yes.

9 A. I was already working up under Vice
10 President Jimmy Settles.

11 Q. After 2014 when you were working with
12 the office of the president, correct?

13 A. Correct.

14 Q. And at some point after you moved to --
15 your report moved under the office of the
16 president, did you make a request to go work for
17 the Ford department?

18 A. No.

19 Q. Am I correct that the 2014 reassignment
20 to TOP was sort of last -- sort of the most recent
21 position reassignment that you had at UAW?

22 A. Are you asking when I -- I'm sorry. Can
23 you just --

24 Q. Yeah. When you were reassigned sort of

1 to the TOP department in 2014 --

2 A. Okay.

3 Q. -- was that the last reassignment you
4 had at UAW?

5 A. Yes.

6 Q. So I'm going to mark a couple of
7 documents.

8 A. I'm sorry. Can I just go back to that
9 question --

10 Q. Yes.

11 A. -- the last reassignment?

12 I was also assigned from IPS as well.

13 Q. That's fair. So in 2019 you -- your
14 sort of duties were -- you were given duties in the
15 IPS department rather than the TOP department?

16 A. No. Both.

17 Q. Both?

18 A. Yes.

19 Q. So at some point in 2019 your job duties
20 included IPS work in addition to TOP work; is that
21 fair?

22 A. Right. And some State of Michigan.

23 Q. Okay. So I'm going to mark some
24 documents. So I will start by marking this as

1 my own calendar.

2 Q. So what calendar did you keep?

3 A. I usually keep one in my cell phone and
4 also kept -- I'm old school -- also just had my
5 little writings.

6 Q. And do you still have your calendar
7 entries for 2018?

8 A. Probably not. I don't know. I can
9 check. I still have a lot of stuff from 2018. And
10 I might have it in my old phone.

11 But if I wasn't on vacation or medical
12 and the presidents had a meeting, more than likely
13 I was there.

14 Q. Okay. Am I correct that you went out on
15 leave on October 3rd of 2018?

16 A. Yes, I believe so.

17 Q. How far in advance of your going out on
18 leave on October 3rd did the kiss incident occur
19 with Mr. Foster?

20 A. I'm not sure because I can't remember
21 what date the kiss occurred.

22 Q. Okay. If there was a presidents meeting
23 on the 26th of September, when would have been the
24 previous presidents meeting?

1 A. The president meetings -- they're
2 biweekly meetings. They're every two weeks.

3 Q. Okay. Can you flip back to Page 28 of
4 this calendar? It shows that there was a
5 presidents meeting September 5th. Do you see that?

6 A. Uh-huh.

7 Q. Do you have any reason to believe there
8 wasn't a presidents meeting on September 5th?

9 A. No. I do know that there were also
10 other meetings on that week. My calendar was
11 always full. I never used this, never.

12 If someone sent me this meeting notice
13 and it would pop up, every now and again I might
14 respond and I would say I was going to attend.

15 But these should be filled. That's why
16 I know that is not accurate because my every day
17 was filled just about with meetings.

18 Q. I think I probably will have a
19 conversation with your counsel about asking you to
20 pull those calendars. To the extent you have
21 things that are responsive, I think they should be
22 produced so that we can ask you questions about
23 them and try to get some dates.

24 A. That one I most definitely will pull up.

1 A. George had IPS. Mark Liburdi had TOP
2 and George had IPS. So when I say he had IPS, he
3 was the AD over IPS and Mark Liburdi was the AD
4 over TOP. And then George became the AA when Ruben
5 left.

6 Q. Okay. And then after Ruben left you had
7 conversations with George Hardy about reassigning
8 you; is that fair?

9 A. Not reassigning me but about me learning
10 another line of business.

11 Q. Got it. So what lines of business sort
12 of were available within the department?

13 A. Well, we had IPS, we had arbitration, we
14 had aerospace, insurance, and state of Michigan.
15 At that time we didn't have gaming. Gaming came
16 later.

17 Q. In speaking to Mr. Hardy about your
18 desire to learn or work in a different line of
19 business, did you ever make a connection between
20 your desire to do that and your desire not to work
21 with Mr. Foster?

22 A. No. Did I ever tell George or relay
23 that to George?

24 Q. Yes.

1 A. No.

2 Q. Was it part of what was motivating you
3 though?

4 A. Once Miguel came to the department I had
5 that conversation, most definitely. And I would
6 have never told George why. I would have never got
7 myself in that type of trouble.

8 Q. What kind of trouble would it have been?

9 A. I wouldn't want to end up in a situation
10 where -- that I'm in now. I feel like I lost my
11 job because of all of this. That's why I keep
12 saying I just wanted to do my job.

13 I never would have said anything about
14 sexual harassment to anyone because I just wanted
15 to do my job. And I say that because I didn't want
16 to end up like this. I didn't want to end
17 up -- I feel like retaliation.

18 I just -- somehow I did not tell George
19 that I wanted to move, you know, because Miguel was
20 over TOP. But I did tell George and I kept going
21 back and I kept going back, you know, when is this
22 going to happen. George, you said you were going
23 to do this. George, when can I move, when can I
24 leave. I kept going back and having that

1 A. There were three assistant directors.
2 Miguel was one of them.

3 Q. And who were the other two?

4 A. Nadja was one. I'm trying to think.
5 Nadja was an AD. George was an AD for a minute and
6 then he became AA. Then there was Miguel, Mark
7 Liburdi. Okay.

8 They didn't replace George so we ended
9 up with two in the end, which was Nadja and Miguel.

10 Q. Okay. So I guess one of my questions is
11 when you spoke to George about wanting to go to
12 work for a different area under his umbrella, did
13 you only specify departments that Miguel was not
14 involved with?

15 A. Yes. I actually also put that in
16 writing. When Joe came, I put it in writing to
17 Joe.

18 Q. Okay. And Joe came at some point in
19 2019, is that correct, or after you came back from
20 leave?

21 A. After I came back.

22 Q. All right. So you went out on a leave
23 we previously established October 3rd, right?

24 A. Yes.

1 Q. And approximately do you recall when you
2 came back to work at UAW?

3 A. March 11th.

4 Q. Of 2019?

5 A. Yes.

6 Q. And during this period when you were out
7 on what I'll call like the first period of
8 disability leave for our purposes, you were sent
9 for an IME with Dr. Shiener; is that correct?

10 A. That is correct.

11 MS. CARTER: So let's mark a document.

12 (A document was marked Defendants'
13 Deposition Exhibit No. 7.)

14 BY MS. CARTER:

15 Q. So I'm handing you a document that has
16 been marked as Exhibit 7 with Bates numbers UAW 414
17 to 423.

18 Do you recognize this document?

19 A. Yes.

20 Q. Is this the report that Dr. Shiener, the
21 IME, prepared?

22 A. I believe so.

23 Q. And the first sentence of this says that
24 he conducted an evaluation of you on February 28,

1 things that are in Dr. Shiener's report.

2 A. Okay.

3 Q. Is it correct that you told Dr. Shiener
4 that you did see yourself returning to work at UAW?

5 A. That I didn't or I did?

6 Q. That you did.

7 A. Yes.

8 Q. And isn't it in fact true that you
9 wanted to return to work at this point in time?

10 A. Yes. After I found out that George was
11 demoted and we had a new AA, which was Joe Rioux, I
12 thought it was because of what happened with me
13 before I left, before I went on medical, so I
14 thought it would be safe to go back and I was going
15 to actually end up in another department.

16 Q. Okay. What was your basis for believing
17 that George's demotion and the appointment of a new
18 AA was related to you in any way?

19 A. Because George was liked by everyone.
20 He was doing a great job. I didn't -- my opinion,
21 I didn't see any reason for him to be demoted
22 outside of the way he handled my case. Or maybe
23 that's what I wanted to belief. I don't know. But
24 I was happy to know that there was going to be

1 someone new coming in to take over the department.

2 Q. And when you say the way he handled your
3 case, are you referring to the report of the kiss
4 by Mr. Foster?

5 A. The way he handled the whole ordeal with
6 bringing me into Miguel's office. Just all of
7 that.

8 And I thought because he didn't take it
9 to human resources that that might have had
10 something to do with it.

11 Q. What's your basis for believing he
12 should have taken it to human resources?

13 A. After Nadja advised that that's where he
14 should have taken it.

15 Q. Anything else?

16 A. Because there was a complaint. I mean,
17 we don't have anything written, like any rule where
18 there's a list of things that you should have taken
19 and not take.

20 But because Nadja, who was another
21 management person at that time, said she spoke with
22 George and told George he should have taken it to
23 human resources. At that point I believe he should
24 have as well.

1 discussed your -- for which you prepared this
2 document, Exhibit 8?

3 A. George and Miguel and Joe.

4 Q. Okay. And you identified that you would
5 be interested in gaining aerospace and IPS; is that
6 right?

7 A. Yes.

8 Q. And that you wanted to attend
9 arbitrations?

10 A. Yes.

11 Q. Did you at any point tell Joe Rioux that
12 you didn't want to be reassigned if it meant --
13 reassigned to an area if it meant working with
14 Mr. Foster?

15 A. I thought this did it.

16 Q. And why would this do it?

17 A. Because TOP is not on here and Miguel
18 only had TOP.

19 Q. Okay. Did you ever specifically tell
20 Joe that your issue with TOP was an issue with
21 Miguel?

22 A. I never told anyone about my issue with
23 Miguel as it relates to TOP because I -- I just
24 wanted to come do my job. I did not want to have

1 any troubles. I didn't want to get fired, in
2 organizing. I didn't want any problems. I just
3 wanted to work. I felt like after all my years of
4 just servicing that's what I should be able to do,
5 just come to work and do my job.

6 So no, I did not tell Joe Rioux anything
7 because Joe Rioux would have shared it with Miguel,
8 George, Shrock, everyone. No, I didn't.

9 Q. Okay. And do you have any reason to
10 know if Joe Rioux knew anything about the kiss that
11 Hardy gave you or any of your other previous
12 interactions with Hardy?

13 MR. EVELYN: Objection as to form.

14 Go ahead; answer.

15 BY THE WITNESS:

16 A. I didn't -- I thought he did up until my
17 meeting with Shrock when Jeff Shrock advised me he
18 didn't.

19 BY MS. CARTER:

20 Q. So why did you think he did?

21 A. Because they all in that -- I don't want
22 to say clique, but a lot of management is just in a
23 clique. I figure why wouldn't he know. It's
24 something that just happened before he became the

1 on or about March 26th of 2019, does that sound
2 right?

3 A. Sounds about right.

4 Q. What was your understanding of the
5 purpose of that staff meeting?

6 A. That we were going to get our
7 assignments.

8 Q. And who was present at that meeting?

9 A. I can just say who wasn't present
10 because it was the entire staff with the exception
11 of Sandra because I believe she was out on medical.
12 And Nadja I don't believe was at that meeting. And
13 I don't -- and Laura was no longer in our
14 department. I think everyone else was there.

15 Q. So did he just sort of go around the
16 room and give people assignments or how did it
17 work?

18 A. It started with Joe saying that Miguel
19 and George now have the new assignments and Miguel,
20 I'm going to let you start. And Miguel had his
21 documents and he handed one over to me, gave one
22 over to Anthony and one over to Jorge.

23 Q. And what was on your document?

24 A. That I would be reporting to Miguel for

1 HAP, which is still insurance, and then I would
2 also have some assignments with George, which is
3 IPS.

4 And at that point I just screamed out
5 why can't I get out of TOP. I was very emotional.
6 And Joe Rioux' response was this is not the meeting
7 for that; we can talk about that later. And after
8 that I said absolutely nothing and the meeting just
9 went on.

10 Later after the meeting was over I was
11 upset. I was on my way home and George saw that I
12 was upset. As I was walking down the hall he
13 called me to his office. He's like, Patricia, he
14 said, you just got to calm down. You know, you got
15 Joe Rioux upset. He felt like you disrespect him
16 in the meeting, you questioned his authority.

17 And I said I don't give a damn. I said,
18 George, you're a part of everything that happened
19 before. I have been gone four months. Four
20 months. I said why don't anybody give a damn. Why
21 don't anybody care? He's like Patricia, just calm
22 down, I'll talk to Joe, I'll take care of it, I'll
23 take care of it. I said I don't trust anyone and
24 walked out.

1 Q. So who, if anyone, did you talk to about
2 getting an assignment where you would not be
3 reporting to Miguel following that meeting?

4 A. Following that meeting? There wasn't
5 another meeting. After that I requested my IME and
6 I requested -- after this happened I requested my
7 IME report and I requested a copy of my personnel
8 file because I'm like did the IME doctor not tell
9 them what I just went through? It's like what's
10 going on with these people. Why don't anybody
11 care? I just felt like nobody cared.

12 And after that an investigation started,
13 my second investigation.

14 Q. You didn't expect Dr. Shiener's report
15 to contain a narrative of everything you had told
16 Dr. Shiener, right?

17 A. I expected his report to pertain to
18 things that happened with me regarding why I was
19 out from UAW, sexual harassment, not my medical
20 history, my past, my parents and all. I didn't
21 expect any of that.

22 Q. You expected Dr. Shiener's report to
23 contain your allegations of harassment at UAW; is
24 that right?

1 my old office because it was still my office. I
2 was going to my office to get something out of the
3 office and he was standing like right in front of
4 Sandra Parker's office. And when I saw him, I just
5 turned around and I went back the other way.

6 Q. Anything else in terms of instances of
7 attempted intimidation?

8 A. Not that I can recall right now.

9 Q. All right. So did there come a time
10 when you were interviewed by Jeff Shrock about your
11 interactions with Miguel Foster?

12 A. The investigation?

13 Q. Yes.

14 A. Yes.

15 Q. And am I correct that your interview
16 with Mr. Shrock occurred April 2nd of 2019?

17 A. Yes. Well, I met with Jeff four times.

18 Q. Okay.

19 A. The first time I met with Jeff I was
20 with a committee person named Robert Evans because
21 my committee person wasn't available. But -- okay.
22 I called my president. I tried to reach him and I
23 couldn't so I left him a message.

24 As we were on the way to Jeff Shrock's

1 office the president called and he said, no, you're
2 not going to meet with Jeff Shrock and Robert
3 Evans; I want to be in your meeting. So go ahead
4 to the meeting and table the meeting and let Jeff
5 Shrock know that you can't meet with him until I
6 come in. So I did that. That was my first
7 meeting.

8 Q. So to stop you there. That first
9 meeting, there was no substantive discussion, like
10 you met him as in "Hi, I'm Jeff"; "Hi, I'm
11 Patricia," but there was no substantive discussion;
12 is that fair?

13 A. He did say that he wanted to meet with
14 me and my union representative to talk about the
15 complaint that I had filed -- to talk about the IME
16 report that was filed. And I said okay. And so
17 that was the first. And so we left after that,
18 Robert and I.

19 The second meeting was he just wanted to
20 let me know there was going to be a thorough
21 investigation. And at that meeting I asked if I
22 could move my office. I told him because I was no
23 longer feeling safe over on that side. And he told
24 me it would be okay.

1 And then the third meeting was the
2 initial investigation meeting.

3 Q. And that's the April 2nd one?

4 A. No. I'm sorry. Even in that second
5 meeting, that's the one with Joe Rioux, and that's
6 when he advised that I would be reporting to Joe
7 Rioux and -- I would be reporting to Joe Rioux,
8 that's what he said, while the investigation was
9 going on.

10 Q. So am I correct that Jeff Shrock
11 interviewed you about your allegations concerning
12 Miguel Foster prior to the meeting with you and Joe
13 Rioux about where your office was going to be?

14 A. No. When you say prior, no. That was
15 after my meeting with Joe Rioux that he did the
16 investigation on me.

17 Q. So it's your testimony that the meeting
18 about where to move your office occurred before the
19 interview, the substantive interview?

20 A. Only because he had already told me that
21 there was going to be an interview when I met with
22 him and Robert. So one, that there was going to be
23 interview once Scott Andrews was available. I
24 tabled that one because Scott told me to.

1 The second time that we met it was with
2 Joe Rioux, Scott, me, and Jeff. And that was to
3 tell me who I was going to be reporting to until --
4 and I'm trying to think if Scott was even
5 available. I know me, Joe Rioux, and Jeff was
6 there, but that was just to let me know that my
7 reporting structure has changed and that's because
8 Scott wasn't there. So -- but he asked if he can
9 meet with me, if it was okay if Scott wasn't there
10 and I told him yes. And he said this meeting was
11 just about the reporting structure.

12 So the next meeting was the actual --
13 Scott came to the meeting and we actually met.

14 Q. So earlier this morning we looked at a
15 document that was marked as Exhibit 3. These are I
16 believe notes of Jeff Shrock's sort of interview
17 with you; is that fair?

18 A. Yes.

19 Q. Okay. And this is dated April 2nd,
20 2019. Does that sound about right?

21 A. Yes.

22 Q. So --

23 A. He must have called me in on April 1st
24 because I met with him prior to meeting with --

1 prior to our investigation. And he moved my
2 desk -- he allowed me to move prior to the
3 investigation.

4 Q. Okay. Did the meeting that you had
5 where you discussed a revised reporting structure
6 happen before or after April 2nd of 2019?

7 A. I don't know if it was -- it had to
8 happen before because this is the investigation.

9 Q. Okay.

10 A. So he moved me prior to, or he allowed
11 me to move prior to. He asked Joe if there were
12 any other available offices.

13 Unless it happened on the same day at a
14 different time. I'm not really sure of the date,
15 but I do know he allowed me to move my desk.

16 Q. Okay. It's my understanding that after
17 the investigational interview on April 2nd that
18 there was a subsequent meeting with you and Shrock
19 and Joe Rioux to discuss who you would report to in
20 terms of work. Does that sound right?

21 A. I don't know. I'm not sure. I'm just
22 not sure of the dates. But I do know that yes,
23 there was a meeting for me to -- for them to report
24 who I would be reporting to. I'm just not sure of

1 convention, where, you know, constitutional
2 convention.

3 Q. A thousand-plus people; is that fair?

4 A. Maybe so.

5 And as far as who work on the floor,
6 it's whoever they assign at the time. So different
7 departments are assigned to work the floors.

8 Q. Approximately how many people work on
9 that floor in Solidarity House?

10 A. How many people work the convention?

11 Q. No. I'm sorry. Work on -- what floor
12 did you work on in Solidarity House?

13 A. Two. Second floor.

14 Q. How many people on the second floor
15 roughly?

16 A. Maybe 20.

17 Q. How many people work in Solid House as a
18 whole?

19 A. I'm not sure.

20 Q. How many floors are there?

21 A. Five, six. I don't know. Five I think.
22 Well, if you count the basement because you do have
23 people down there, I think it's six.

24 Q. At any point during the investigation

1 process in April of 2019 did you ask to move to a
2 different department?

3 A. No, but I did ask why can't Miguel be
4 moved to a different department. When he told me I
5 could ask to move my office, I asked why couldn't
6 he move his office. Why do I have to move my
7 office. And my president asked that question as
8 well.

9 Q. So the questions about Miguel moving
10 offices, that was about the physical location of
11 his office, right?

12 A. Yes. That was about me being three
13 doors down from him.

14 Q. Okay. Did you ever ask if Miguel could
15 move departments, not physical office but the
16 department to which he was assigned?

17 A. When he asked -- when Joe Shrock asked
18 me what did I want, I said not to have to see
19 Miguel every day. I said not to have to work with
20 Miguel.

21 So yes, I did tell him I don't want to
22 see him, basically send him someplace else.

23 Q. Well, what you said was you didn't want
24 to have to see Miguel every day, right?

1 A. Which is impossible being on the second
2 floor. We share the same kitchen, we share the
3 same copy room, we share the same secretaries.
4 That's impossible.

5 I saw Miguel when I was moved over to
6 the other side just temporarily and I had to turn
7 around. But I was told I can come in early, I can
8 leave late. If I need copies, instead of me
9 copying them, I can give them to the secretary and
10 have her copy. That would keep me from running
11 into Miguel.

12 Q. Did you ask to move to a different
13 department within UAW altogether?

14 A. No. I didn't want to move to a
15 different department. I wanted to continue to work
16 where I was working.

17 Q. So following Jeff Shrock's investigation
18 you were only going to be reporting to Joe Rioux;
19 is that right?

20 A. Yeah, but Joe advised me that I can also
21 work with George. Because they were assigning --
22 they needed people to call around and find out if
23 they was going to use (inaudible). So in order for
24 me to do that, I had to be assigned to George.

1 about the investigation. Does that sound right?

2 A. Yes.

3 Q. So between that point and when you went
4 out on medical leave for the second major period
5 did you have any interactions with Foster?

6 A. No. I saw Foster and that's when I said
7 he was looking very angry.

8 Q. Okay. So there was the look. Any other
9 interactions with Foster between those two times?

10 A. I didn't see him. No.

11 Q. Am I correct that you went out for this
12 sort of second long period of disability on April
13 25th, 2019?

14 A. Probably. I'm not sure of the dates. I
15 think.

16 Q. But late April sounds right?

17 A. Yeah.

18 Q. You had been considering going back on a
19 disability leave status prior to the April 17th
20 meeting with Shrock and Naghmana, right?

21 MR. EVELYN: Objection as to form. Are you
22 talking about a specific time frame?

23 BY MS. CARTER:

24 Q. Well, between when you returned -- when

1 talk about what it is that you're seeking in terms
2 of damages in this lawsuit.

3 A. Okay.

4 MR. EVELYN: Yeah, go ahead.

5 BY MS. CARTER:

6 Q. That wasn't a question. It was more of
7 a statement.

8 So as I understand it, you're seeking
9 about \$2-1/2 million in lost wages. Does that
10 sound about right?

11 A. I think that was the last thing that we
12 got to.

13 Q. Okay. And is that a number that you
14 calculated or that someone else calculated?

15 A. I actually calculated it more and I
16 believe my attorneys did, too.

17 Q. Now I'm talking about lost wages, right,
18 in terms of money that you would have made if
19 you -- well, let me back up.

20 You're still employed by the UAW, right?

21 A. No.

22 Q. You are on leave from the UAW, correct?

23 A. As of June 30th my -- I received a
24 letter that I was terminated.

1 Q. Okay.

2 THE VIDEOGRAPHER: Sorry to interrupt. Can
3 you move the microphone a little be closer to the
4 witness?

5 BY THE WITNESS:

6 A. As of June 30th I was terminated. I was
7 actually initially terminated in April, but due to
8 a mediation we had planned, I was advised that I
9 would be -- if we didn't come up with a settlement
10 at that point, the rest of my benefits and my -- I
11 would be terminated as of June 30th.

12 BY MS. CARTER:

13 Q. And you understand that's because you've
14 been on medical leave for over a year, correct?

15 A. Yes. I do understand that's their
16 rationale.

17 Q. Okay. And that prior to the termination
18 letter you could -- if you were released to return
19 to work by your doctor you could have come back to
20 work at the UAW, correct?

21 A. That is correct.

22 Q. Okay. In calculating your damages how
23 long did you anticipate continuing to work at the
24 UAW?

1 A. I don't know. I could have worked as
2 long as I wanted to.

3 Q. How long did you -- but how long did
4 you -- at what age did you anticipate retiring from
5 the UAW?

6 A. I didn't. It depends on when my
7 finances was right.

8 Q. Are you aware that under the current
9 calculation you are assuming that you would have
10 worked at the UAW until you were 77 or 78 years
11 old?

12 A. No.

13 Q. Okay. Do you think you would have
14 worked until you were 77 or 78 years old?

15 A. I doubt it.

16 Q. Okay. What's your best estimate as to
17 when you would have retired from the UAW?

18 A. I'm not sure. It depends on my health,
19 my finances, if I'm still married. I don't know.

20 Q. Have you ever contemplated working past,
21 say, age 65?

22 A. Yes.

23 Q. How about past 70?

24 A. Never gave it much thought.

C E R T I F I C A T I O N

I, SUSAN K. TODAY, a Shorthand Reporter
and Notary Public within and for the State of
Florida, do hereby certify:

That PATRICIA MORRIS-GIBSON the witness
whose examination is hereinbefore set forth, was
first duly sworn by me and that this transcript of
said testimony is a true record of the testimony
given by said witness.

I further certify that I am not related
to any of the parties to this action by blood or
marriage, and that I am in no way interested in the
outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set
my hand this 14th day of July, 2021.

SUSAN K. Today, CSR-IL, RPR
Notary Public, Orange County, Florida
My Commission expires: 12-4-2023